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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 15 0489 RS
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE STATUS CONFERENCE
v.)	
)	
RANDOLPH EDMOND KNOBLOCK,)	
ERIC SHELBY MELOVICH, and)	
DOUGLAS LEE SMITH,)	
)	
Defendants.)	

STIPULATION

IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

1. The case is currently set for a status conference on March 29, 2016 at 2:30 p.m.
2. Counsel for the government must be in San Jose on another matter and is therefore not available for the status hearing. Counsel for Mr. Melovich has also asked for additional discovery, which government counsel is currently obtaining and anticipates providing within the next week.
3. Accordingly, the parties jointly request a continuance of the matter to May 3, 2016.
4. The parties further respectfully submit and agree that the period from March 29, 2016, through and including May 3, 2016 should be excluded from the otherwise applicable Speedy Trial Act

1 computation because the continuance is necessary for effective preparation of counsel, taking into
2 account the exercise of due diligence.

3 4. The parties concur that granting the exclusion would allow the reasonable time necessary
4 for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. §3161(h)(7)(B)(iv). The
5 parties also agree that the ends of justice served by granting such an exclusion of time for the purposes
6 of effective preparation of counsel outweigh the best interests of the public and the defendant in a
7 speedy trial. 18 U.S.C. § 3161(h)(7)(A).

8
9 IT IS SO STIPULATED.

10
11 DATED: March 23, 2016

BRIAN J. STRETCH
Acting United States Attorney

12
13 /s/
14 SARAH HAWKINS
Assistant United States Attorney

15
16 DATED: March 23, 2016

17 /s/
18 STEVEN G. KALAR
Counsel for Randolph Edmond Knoblock

19
20 DATED: March 23, 2016

21 /s/
22 PETER GOODNAM
Counsel for Eric Melovich

~~PROPOSED~~ ORDER

Based upon the above-described Stipulation, THE COURT FINDS THAT the ends of justice served by granting a continuance from March 29, 2016 through and including May 3, 2016 outweigh the best interest of the public and the defendant in a speedy trial, and that failure to grant such a continuance would unreasonably deny the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Accordingly, THE COURT ORDERS THAT:

1. The parties shall appear before the Court on May 3, 2016 at 2:30 p.m. for further status conference.
2. The period from March 29, 2016 through and including May 3, 2016 is excluded from the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

IT IS SO ORDERED.

DATED: 3/23/16


HON. RICHARD SEEBORG
United States District Judge